

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

FILED

OCT 24 2013

Clerk, U. S. District Court  
Eastern District of Tennessee  
At Knoxville

Antonio Williams )  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
(Enter above the NAME of the plaintiff in this action.) )  
v. )  
1. Sheriff Jimmy Jones )  
2. Knox County Sheriff's Department )  
CONT'D ON PAGE 1A )  
(Enter above the NAME of each defendant in this action.) )

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
(42 U.S.C. Section 1983)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES ( ) NO (✓)

B. If your answer to A is YES, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to the previous lawsuit:

Plaintiffs: \_\_\_\_\_

\_\_\_\_\_

Defendants: \_\_\_\_\_

\_\_\_\_\_

3. capt. "John Doe" Wilshire
4. capt. "John Doe" Anderson
5. Lt. "John Doe" Haiman
6. Sgt. Paul Cooper
7. Sgt. "John Doe" Travis
8. correctional officer "John Doe" Dobbs
9. correctional officer "John Doe" Rutherford
10. correctional officer "John Doe" Wallace
11. correctional officer "John Doe" E Todd
12. nurse "Jane Doe" Jones
13. any other defendants to be determined during discovery

2. COURT: (If federal court, name the district; if state court, name the county):

3. DOCKET NUMBER: \_\_\_\_\_

4. Name of Judge to whom case was assigned: \_\_\_\_\_

5. Disposition: (For example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_

6. Approximate date of filing lawsuit: \_\_\_\_\_

7. Approximate date of disposition: \_\_\_\_\_

II. PLACE OF PRESENT CONFINEMENT: Knox County Sheriff's Department

A. Is there a prisoner grievance procedure in this institution? YES (  ) NO (  )

B. Did you present the facts relating to your complaint in the prisoner grievance procedure? YES (  ) NO (  )

C. If your answer is YES,

1. What steps did you take? Submitted Grievances on  
01-21-13

2. What was the result? GRIEVANCES ARE STILL  
PENDING, CONT ON PAGE 2A

D. If your answer to B is NO, explain why not. NA

E. If there is no prison grievance procedure in the institution, did you complain to the prison authorities? YES (  ) NO (  )

F. If your answer is YES,

1. What steps did you take? \_\_\_\_\_

6.

2. The prison's litigation reform act of 1990 P.L.W.A. allows 90 days for a facility to respond to a grievance subsequently, in accordance with the aforesaid, pg. 31 SEC. VI.F of KXX county Sheriff's office inmate handbook clearly states that "a response to a grievance will not exceed 90 days from receipt of the grievance." However, every time I request a response to the grievances that I have filed on this matter, from the initial complaint filed on approx 6-22-13 to approx 20 grievance's I've submitted requesting a response to my complaints I am told that the matter is still pending.

2. What was the result? \_\_\_\_\_  
\_\_\_\_\_

### III. PARTIES

(In item A below, please your name in the first blank and place your present address in the second blank. Do the same for any additional plaintiffs.)

A. Name of plaintiff: Antonio Jones Williams

Present address: Knox County Sheriff's Department 300 University, Knoxville, TN 37910

Permanent home address: 525 Linden Ave Knoxville, TN 37911

Address of nearest relative: 525 Bedford Rd Apt A 425 Knoxville 37919

(In item B below, place the FULL NAME of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the additional names, positions, and places of employment of any additional defendants.)

B. Defendant: Sheriff Jimmy Jones and the Knox County Sheriff's Department

Official position: (1) Sheriff, Knox County

Place of employment: (1) City County Building, 400 Union Ave Knoxville 37902

C. Additional defendants: cont. PAGE 3A

### IV. STATEMENT OF CLAIM

(State here as briefly as possible the FACTS of your case. Describe how EACH defendant is involved. Include also the names of other persons involved, dates and places. DO NOT give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary.)

1. At the time of the incident I had been and  
placed in administrative segregation by the facility

2. Capt. "John Doe" Winkles  
Facility Commander, Captain  
Knox County Sheriff Detention Facility  
5001 Malakayville Rd  
Knoxville, TN 37918

3. Capt "John Doe" Anderson  
Facility Commander, Captain  
Knox County Sheriff Detention Facility  
5001 Malakayville Rd  
Knoxville, TN 37918

4. Lt. "John Doe" Harmon  
Supervisor  
Knox County Sheriff Detention Facility  
5001 Malakayville Rd  
Knoxville, TN 37918

5. Sgt. Paul Cooper  
Supervisor  
Knox County Sheriff Detention Facility  
5001 Malakayville Rd  
Knoxville, TN 37918

6. Sgt. "John Doe" Tamm  
Supervisor  
Knox County Sheriff Detention Facility  
5001 Malakayville Rd  
Knoxville, TN 37918

7. C/o "John Doe" Wallace  
correctional officer  
Knox County Sheriff Detention Facility  
5001 Montezuma Rd  
Knoxville, TN 37918

8. C/o "John Doe" Butterfield  
correctional officer  
Knox County Sheriff Detention Facility  
5001 Montezuma Rd  
Knoxville, TN 37918

9. C/o "John Doe" Dobbs  
correctional officer  
Knox County Sheriff Detention Facility  
5001 Montezuma Rd  
Knoxville, TN 37918

10. C/o "John Doe" Kidd  
correctional officer  
Knox County Sheriff Detention Facility  
5001 Montezuma Rd  
Knoxville, TN 37918

11. LPN "Jane Doe" Jones  
NURSE  
Knox County Sheriff Detention Facility  
5001 Montezuma Rd  
Knoxville, TN 37918

13. Any other defendants to be determined during discovery

eg. Protective custody.

2. I was classified maximum security and being housed in Building 1, unit B which is a protective custody unit. At the time of the incident C/O DOBBS was the unit B officer.

3. C/O KIDD was the unit officer on unit 1-D unit 1-B and unit 1-D share the same rec yard.

4. Facility policy requires that all maximum security inmates must wear wrist restraints anytime they are outside their cell.

5. On 01/19/13 at approx 12:30 pm C/O DOBBS placed me in restraints alone on the recreation yard for my hour rec time.

6. I walked over to the unit 1-D rec yard door. I could hear C/O DOBBS on his radio calling over to unit 1-D and asking C/O KIDD if his rec yard door was locked and C/O KIDD responded that his door was locked!

7. Approaching the door, I found it to be unlocked. I opened it and began yelling up to an inmate who was locked inside his cell on the second floor.

8. I have an extremely bad voice, so theres no way other heads are getting escaped since there nobody outside those cells, and it was only two people in the day room.

9. Having concluded my conversation I closed unit D rec yard door and start it to write onward.

10. approx 30 sec after I closed the door, it suddenly opened up an inmate dressed only in a tee shirt boxers, socks shoes ran out on the rec yard attack me in full force and began beating me punching, kicking me.

11. not only did this inmate out weigh me by at least 100 lbs - I am 30 yrs old 147 lbs. - but I was in wrist restraints AND HE WASN'T!.

12. unit D, in which this inmate was being housed, was a disciplinary unit requiring that every inmate wear restraints when outside their cells.

13. Furthermore, inmates housed in Building 2 must be dressed in these jump suits any time they are out side their cell.

14. Building 2 is a maximum security Building consisting 4 units, A thru D, with unit 'D' being a disciplinary unit. This makes Building 2 a unit D the most secure unit at the facility.

15. Additionally, I have been placed on administrative

for the purpose of me not being attacked  
by any inmate.

16. IT WAS IMPOSSIBLE for this inmate  
to have gotten out of his cell out  
of dress code all the way to the  
rec yard without 110 KIDS help
17. I'VE never been in more fear. That  
WAS the most terrible day of my life  
I WAS in hand cuffs he wasn't  
while C'D KIDD watched.
18. C'D KIDD IS APPROX 6'2", 300LBS AND WOULD OF  
had no problem breaking this up. TO know  
I WAS BEING BEAT, KICKED, PUNCHED,  
while KIDD watched left me  
NO DOUBT I would be beat to  
death.
19. This inmate kicked me punched me  
and stomped me on my head. I  
BLOCKED out then came BACK in  
to only realize it was still  
GOING ON.
20. I was picked up and stomped on my head and  
BACK approx 5 times, each time worse than the last  
I lost both should to resist, and balance  
with C'D KIDD standing there watching.

21. For all I know, CO DOBBS was also watching it all through the unit rec window and that he was allowing this to happen also. As my unit officer I had no reason to believe that he was not watching me since it was his job to do so!

22. I have never felt as much pain nor have I been so lost and confused as I was while being beaten that day. It seemed to go on and on and on. In reality it seem like 2 mins.

23. I was about to pass out again when headed CO KIDD told's inmate, "that was enough" that the fight was over; for him to return to his cell. I couldn't believe he had allowed this inmate to beat me and was now instructing him to return to his cell as though he had been the victim!

24. It was only after CO KIDD had given this inmate time to return to his cell, DID he finally get on his radio and called for help!

25. I was extremely dizzy and don't remember every one who responded but I do recall CO HOWARD, SGT COOPER, CO WILKINS AND CO Rutherford. I heard CO KIDD yelling, "He is on the ground!"

26. I expected some kind of help instead I was attacked again for no reason, this time by CO WILKINS CO Rutherford I was struck when they struck at to knee me, knowing the word at of one again when I was already injured.

27. I watched as what appeared to be no less than 20 officers pour out on the rec yard. I have no idea what exactly they were responding to cause there was no fight and the inmate who attempted to kill me had been ushired back to his cell by do kris who had let him out to get me in the first place before he had made the call for help.

28. With Lt Herman clearly in charge and as a victim of a serious and almost fatal attack, my face and arms bleeding from numerous cuts and abrasions from this section's attempt to kill me by nothing less than a mace "hit man", I was thrown to the concrete by numerous officers, all charged up for what appeared to be a response to a fight?

29. even though the obvious evidence - me on the yard bleeding and alone and in restraints - clearly demonstrates that that something else was going on. I was treated as though I had been the aggressor, with Lt Herman's instructions, the restraints were removed from me wrists, I was rolled to my stomach and for ABSOLUTELY no reason what so ever I was peppered with my hands behind my back by do wallace - rutherford.

30. Every chance they got, they stomped their fists and knee into my back side and head.

31. I cried out and begged them to please stop that I  
hadn't done anything or was I attempting to do  
anything other then to see some type of medical attention.

32. my pleass for help was ignored. I'm yelling my event  
hurt that my head is my back hurt but rutherford  
holding my cuffs stems me into the ground  
with his knee in my back just as if I  
assult someone.

33. I kept Begging over and over for them to stop but c/o  
wallace and rutherford dragged me back into unit  
B where I was then slammed against the  
wall, even though I was all ready hand cuffed  
and Bearly even conscious c/o rutherford stems  
me into the wall for ABSOLUTELY no reason  
out all. While it happen and numerous  
others looking on. I was already bleeding bad from  
the last attack

34. I was dragged into my cell by Lt Brown and rutherford, where I was  
thrown on the bunk with Lt Brown taking me down. I'm still called  
rutherford start of biting me over across my face saying I deserved this.

35. In approx April of 2013 while housed in Building 2,  
unit B, they had a major shake down, involving  
numerous correctional officers and K-9's. c/o. Rutherford  
was one of the officers involved and being a  
typical teenager that I was, I. Brown collects  
Rutherford name's trash off cell floor, just  
stomps off.

36. In an attempt at getting even with me for the remarks that I made, Lt. Rutherford slapped me and beat me continuously about the face and head over and over until he finally got tired, with Lt. Harriman holding me down. Lt. Harriman never hit me while I was in the cell, but he never stopped Lt. Rutherford from hitting me.

37. I experienced intense head pain, every punch and slap to my head by Lt. Rutherford felt like he was using a ball bat. I had tears in my eyes as I pleaded with him to please stop. My eyes were blurry and I began blushing in and out, barely able to remove tears. I felt like a rats tail.

38. More than anything I feared for my life. I was being beat by a correctional officer with no witness's which meant they could do anything they wanted to me. Lt. Rutherford repeated how much I deserved the beatings that he was giving me + passed out twice during this assault before Lt. Harriman finally removed the restraints and locked me in the cell.

39. Every part of my body hurt, with most of the pain being in my back, neck, lower back and chest. Approximately 5 minutes after Lt. Harriman and Rutherford left the cell, the unit officer Jacobs appeared at the door. I was in pieces as I asked him why had this been allowed to happen to me? He does say that it was all Lt. Rutherford to do with it.

40. I ASKED #10 DOBBS if he would send me to the clinic, which was a small exam room located in one building. (main clinic is in Bentwaters C.) He said I couldn't go now, the nurse was seeing the inmate that attacked me !!

41. This inmate who beat me up while I was in wrist restraints and weighing at least 100 lbs was then informed not a single injury that I caused, was being examined by the nurse while I was bleeding in my cell !!

42. Approx 20 mins later my Jones comes with C/O #10 attached. I was covered with blood, bleeding from numerous cuts and abrasions. I complained of intense head and back pain without so much as examination. She said to wash the cuts with soap and water, that my injuries were not bad. C/O #10 then said to me, "he is okay!!!". I asked, are you serious? you not going to check me out or nothing? She replied that I would be okay, and they left.

43. I immediately wrote a letter to the Building Supervisor, SGT Paul Cooper and gave it to C/O DOBBS complaining of pain in my head, neck, back and chest. I asked if they would please take me to the hospital. that I was hurt and in need of help. This was approx 1pm.

44. approx 3 hours later, after shift change, approx 3:30 pm I was driven out to Building 1 clinic by nurse Jones after I repeatedly complained about head pain. I was subsequently examined by nurse Jones who then informed SGT Cooper to take photos of my injuries. approx 10 photos were taken.

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45 After a walk to the clinic in building C to collect my medical records, I was placed in restraints and unmercifully dumped in the smallest compartment of a rear county van and driven to UT Hospital. I could barely remain conscious as I was intentionally thrown from one side to another due to the way they were driving.

46 I arrived at UT Hospital at approx 4:30pm. I was examined by a ER doctor, received a full body x-ray and a cath. I was given a shot. It was instructed to inform the facility if I continued to have head pains.

47 I was released from the hospital approx 5 hours later and returned to my cell. Although I was still covered in blood, I was not allowed to take a shower or wash the blood from me until 0-77-13 approx 2 days after almost being beaten to death.

48 I had knots and bumps and cuts all over my body which was even worst due to my short hair as my hands and arms were still cut up. I was in intense pain, every part of my body hurt, either stiffness, shooting or sharp pains the pain was constant. All request for pain meds was denied.

49 I discovered that the man who attacked me was not only extreme before me, he was given 45 days in segregation for trying to beat me to death, (cont)

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— the lowest amount of time allowable, when publicly  
stated he was to receive no less than 60 days! ALSO as a  
reward for almostenthal me to death, he received extra  
food each meal for everyday that he was in positive  
segregation for this assault. this clearly demonstrates that  
the office was ~~safeguarded~~ by staff members other than  
just the CO, whose responsibility was to keep all ~~inmates~~  
and safe!

50. It was clear that this conspiracy began back in Feb 2013 when  
out to punish me, staff members falsified dietary records  
placing me on a "finger food diet" where I ~~was~~ was ~~un~~ unknowing  
remained for over four months

51. In approx July or Aug 2013, I confronted SGT Lewis and  
the ~~physic~~ doctor, Mike Rogers about why I had  
been placed on finger food. Mike Rogers was the  
only person who could facilitate such a diet, since  
people on this type of diet are almost always  
suffering with ~~suicide~~ suicide ~~issues~~ issues

52. To my surprise, I was informed that I had never  
been placed on a finger food diet. There had never  
been such instructions or orders issued nor was there  
any such data in the computer. correction officers in  
Building 2 had conspired together to falsify medical  
records and since this order never came from the  
Kitchen, staff members had to tamper with my food  
the entire time.

53. Receiving a forced food diet for four months is a means of physical punishment, by denying me a regular diet was nothing short of being cruel and unusual punishment.

54. My disciplinary record clearly shows that some time after I was indicted of a felony charge while awaiting another court date I developed a juvenile attitude problem and stated not exactly what was on my mind which certainly upset staff members.

55. However, one would assume that correctional officers would have a tougher skin as to allow the comments from a frustrated teenager to cause them to violate my protection under the United States Constitution.

56. On APPROX 01/22/13 approx 2 days after the incident I submitted a grievance discussing everything that had happened to me during the 0-19-13 incident. I describe what the inmate had done and how the staff member were allowed to beat me while a senior staff member A Building supervisor and facility supervisor looked on and assisted. How medical refused to treat me until I made a urgent written request through a Building supervisor.

57. Since my initial Grievance, I've submitted no less then 20 grievances from not receiving adequate medical attention to the facilities failure to respond to my initial Grievance concerning this incident even though it's over 90 days.

58 Housing location and disciplinary records unequivocally demonstrate that this facility has caused me as much physical pain and discord as they can get away with, while denying me adequate medical attention. Even though I've continually complained of head, neck, and back pain. I've not had a single MCI nor a follow up visit since nor have I been examined by a chiropractor. When my head and back pain becomes so intense and my complaints seem to them to be more urgent, they simply check my vital signs nothing more.

59 I continue to suffer from head, neck and back pain. I'm extremely fearful of being around a group of officers, especially those officers who beat and attempt to kill me. I suffer with constant recurring nightmares where I am being beaten to death by that inmate or by numerous correctional officers. I am even louder than I was before as I attempt to hide my fear by acting tough.

60 I always assume that given the chance, a lawless correctional officer would have no problem punching a inmate a few times. However, to have experienced an assist facility commander physically participate in a savage assault on my person clearly shows that I can be killed by either an inmate or an officer at this facility.

(11) There are ceiling mounted security cameras that capture the incident at A-19-13. Staff members synopsis to what happen have told me that the video is crucial and unbelievable, that they never seen anything like this. Aside from this officer By this inmate, and the assault by correctional officers on the rec yard various Bullyman 3 security cameras were true captured the following:

A. CO KIDD references a inmate improperly dressed from his cell without wrist-restraints and permitting him to enter the rec yard and

B. CO KIDD didn't permit inmate to return to his cell before calling BACK D.

C. ME Brown physically assaulted inside the day room while I was in wrist restraints

D. Although it does not capture what happen in my room it shows the amount of time they were inside my cell.

E. The aggression being seen before

F. Staff members commanding him for assault bringing me to death.

G. Exactly what correctional officers were standing watching both the excessive force on the rec yard and in my cell by Lt. Hartman CO Rutherford and CO another.

H. Video shows how many times a placed themselves in the rec yard minutes leading my cell to put inmates in the rec for me about this incident.

1. RELIEF

Stating a claim;

1) Defendant "John Doe" KIDD

2) Defendant "John Doe" DOBBS

A. K.C.S.D. policy requires that unit unit officers insure that the connecting unit's recreation yard door is locked prior to releasing any inmate to the rec yard. This clearly wasn't done by either officer. Unit officer's primary function would be to insure inmate's remain in custody and that they remain safe. Large glass windows allow for a clear unrestricted view of the rec yard from the unit officers desk which made it impossible for C/O DOBBS not to have noticed this inmate attempting to open the yard.

Additionally, C/O DOBBS stood at my cell door and watched as I was held down in restraints and beaten by C/O Bafford.

For the purpose of stating a claim both Defendants KIDD and DOBBS are guilty of no less than a failure to protect, in violation of the 8<sup>th</sup> amendment to the United States Constitution.

B. I had been placed in administrative segregation;

housed in a protective unit, in wrist restraints on a rec yard connected to a punitive segregation unit

in a maximum security building. This made it impossible to have full out of his cell, improperly dressed and to the rec yard without C/O KIDD help.

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— and allowed for this attempt on my life by  
a inmate under his control and instructions does  
for the purpose of a slasher or claim, would demonstrate  
no less than excessive force, a clear violation of  
the 14th amendment to the United States  
constitution.

C. Defendant "John Doe" Kidd and defendant "John Doe"  
"DOBBS" are Being sued in their official and their  
individual capacity for both compensatory and punitive  
damages in the amount of 10 million DOLLARS.

3. Defendant "John Doe" Harmon

4. Defendant "John Doe" Rutherford

5. Defendant "John Doe" Wallace

A. Lt. Harmon holds the rank of a Possit Facility  
Commander who first stood by while I was  
Beaten on the yard by correctional officers and  
later assisted to Rutherford in beating me  
continually after dragging me into my cell.  
Lt. Rutherford and Lt. Wallace took every chance they  
got to abuse me on the rec yard and later  
inside the pod. Lt. Wallace tried his best to  
Break my wrist. Lt. Rutherford took his time  
to beat me, specifically striking his  
blows to cause the most pain. I was in a  
cell sitting on a bunk with my hands cuffed  
behind me back while Lt. Harmon held me  
as Lt. Rutherford beat me, slapped and punched  
me as hard as he could.

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B. For the purpose of stating a claim, defendant's  
Harmen, Ruthford and Walker are guilty of no  
less than a failure to protect, excessive force  
and a denial of due process law in direct  
violation to the 8th and 14th Amendments to the  
United States Constitution.

C. Defendants "John Doe" Harmen, "John Doe" Ruthford  
and "John Doe" Walker are being sued in their  
official and their individual capacities for both  
compensatory and punitive damages in the amount  
of 10 million dollars.

(1) Defendant Paul Cooper

As a building supervisor holding the rank of a SGT  
he first stood by as watched as corrections  
officers assaulted me for no reason other than the  
fact that they acted extrajudicially although he  
could see the injuries I incurred during the  
attack he denied me immediate medical care  
waiting almost 3 hrs before I was finally seen.  
As a building supervisor, he had the authority  
to order that I be examined immediately, in  
certainty before the officer was examined.

B. for the purpose of stating a claim, defendant  
Paul Cooper is guilty of no less than a  
failure to protect and a denial of meekness  
in violation of the 8th and 14th Amendment to  
the United States Constitution.

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C. Defendant Phil Cooper is being sued in both his official and individual capacities for both compensatory and punitive damages in the amount of 10 million dollars.

7) Defendant "John Doe" Travis

A) At the time of the incident was the assist Building 1 supervisor, holding the rank of a CP1, like Sgt Cooper who could have ordered that I be examined by the nurse. Both he and Sgt Cooper allowed for the prisoner who suffered no physical injuries from his violent attack on me, to be examined BEFORE me while I was refused.

B. For the purpose of stating a claim defendant "John Doe" Travis is guilty of no less than the denial of medical care which is a constitutional violation.

C. Defendant "John Doe" Travis is being sued in his official and individual capacities for both compensatory and punitive damages in the amount of 10 million DOLLARS.

8.) Defendant "Jane Doe" Jones

A. The defendant knowingly refused to treat and ce to immediately examine me, even though she was told numerous times that I had suffered a head injury and had been knocked unconscious at less than three hours. Her instructions was that I wash the numerous cuts and abrasions with soap and water myself rather than to treat me. This clearly shows a denial of medical care, especially with her being a nurse. If I would of never sent a letter to SGT COOPER, I would havent went to the UT hospital or seen nurse Jones. Nurse Jones was examining the attacker while I was bleeding in my cell for hours before I was examined by nurse Jones who finally instructed I go to the hospital.

B. For the purpose of stating a claim defendant "Jane Doe" is guilty of no less than a denial of medical care which is a constitutional violation.

C. Defendants Jane Doe is being sued in her official and individual capacities for both compensatory and punitive damages in the amount of 10 million dollars

9. Sheriff Jimmy Jones and/or
10. The Knox County Sheriff's Detention Facility

A. Defendant is the Knox County Sheriff and therefore responsible for the actions of those subordinates who work at the K.C.S.D.F. The policy regarding the operation of the K.C.S.D.F. fall directly under his jurisdiction which cannot make them directly responsible - since a facility isn't an individual it would appear that for a purpose of a suit, Sheriff Jimmy Jones must be considered the defendant in this matter.

B. For the purpose of stating a claim, and for the reasons stated Jimmy Jones and/or the K.C.S.D.F. is guilty of excessive force, a failure to protect and a denial of medical care, violation of the United States Constitution.

C. Defendant Jimmy Jones and/or the K.C.S.D.F. is being sued in their official and individual capacities for both compensatory and punitive damages in the amount of 10 million dollars.

DKR:R

11. Defendant capt. "John Doe" Wilshire

12. Defendant capt. "John Doe" Anderson

A. Both these defendants share the duty of being the facility commander and therefore are directly responsible for what happens.

They both had to know about this incident either directly or by radio. However they made no attempt to relieve the shrapnel or insure that I was sent off for surgery.

However officers responded, SGT, CPL, LT in what should have been the most sacred buildings, which demands the facility commanders.

Knew immediately. They failed in their part to correct the situation especially when they had direct access to real time video of the incident, and what took place in the pod afterwards.

B. For the purpose of claim of damages stated both defendant "John Doe" Wilshire and defendant "John Doe" Anderson are guilty of no less than a failure to protect and a denial of medical care.

C. Defendants John Doe Wilshire and Anderson are being sued on their official and individual capacities for both compensatory and punitive damages in the amount of 10 million dollars.

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Evidence clearly shows that there was a joint effort. The tape shows the whole incident that almost cost me my life. In still dealing with issues from it. Numerous officers took place in violating my rights under the U.S. Constitution, which some of this would of been possible without the officers working together. for a inmate to be released from his cell without the proper dress code in hand cuffs while I had cuffs on and securely watching me, to a senior officer assiting a CO beat me unconscious in a cell to be being denied medical attention for almost three hours after the incident. then the person that officed me gets fired at first. I sat in my cell bleeding for hours. this clearly shows a conspiracy. This is on tape. I ask for a stamped filed copy of this complaint.

I (we) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this 21<sup>st</sup> day of oct, 2013

Antonio Williams  
Signature of Plaintiff

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